

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 HEIDI A. OJEDA
5 Assistant Federal Public Defender
6 Nevada State Bar No. 12223
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Heidi_Ojeda@fd.org

12 Attorney for Corey Brown

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

v.

COREY BROWN,

Defendant.

Case No. 2:18-cr-00089-RFB-VCF

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Chris Burton,
18 Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda,
19 Assistant Federal Public Defender, counsel for Corey Brown, that the Court modify his
20 conditions of release.

21 The Stipulation is entered into for the following reasons:

22 1. On July 7, 2017, the Court ordered Mr. Brown's release on a personal
23 recognizance bond with certain conditions, including a travel restriction to the State of Nevada.
24 ECF No. 5.

25 2. Mr. Brown and his family want to take a family vacation to Hawaii to celebrate
26 his brother's college graduation. The family plan to travel from June 16-22, 2020.

3. Counsel has spoken with Pretrial Services concerning this issue. Pretrial Services confirmed that Mr. Brown has been compliant with the terms of his release and takes no position on this issue.

4. The government has no objection to this requested modification so long as Mr. Brown provides Pretrial Services with his itinerary two weeks before his travel and he reports to Pretrial Services within 24 hours of his return and submits to a drug test.

This is the first stipulation to modify conditions of release filed herein.

DATED this 18th day of May, 2020.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Heidi A. Ojeda

HEIDI A. OJEDA
Assistant Federal Public Defender

By /s/ Chris Burton

CHRIS BURTON
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
COREY BROWN,
Defendant.

Case No. 2:18-cr-00089-RFB-VCF

ORDER

IT IS THEREFORE ORDERED that Mr. Brown's condition of release be modified to allow for Mr. Brown to travel outside the State of Nevada to Hawaii.

IT IS FURTHER ORDERED that Mr. Brown provide his travel itinerary, including flights and the location where he will be staying, at least two weeks prior to his travel.

IT IS FURTHER ORDERED that Mr. Brown contacted Pretrial Services within 24 hours of his return from Hawaii and submit to a drug test upon his return.

DATED this 19th day of May, 2020.

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE